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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

EDWARD ROBERT LICHWICK, JR.,

Plaintiff,

- against -

VERIZON,

Defendant.

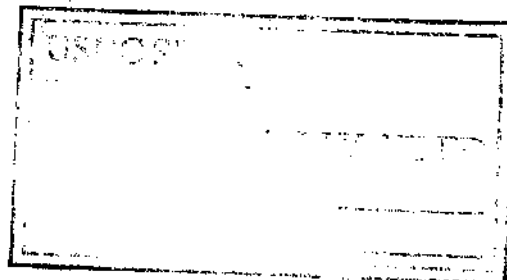
08 CIV 3892 (SCR)

(ECF)

FILED
 U.S. DISTRICT COURT
 S.D. OF N.Y.
 2008 JUN 3 11 P 23 31

NOTICE OF MOTION


PLEASE TAKE NOTICE, that upon the Affidavit of Vicki R. Walcott-Edim, sworn to on June 2, 2008, and the exhibits annexed thereto, defendant Verizon will move this Court, before the Honorable Stephen C. Robinson, United States District Judge, United States District Courthouse, 300 Quarropas Street, Room 633, White Plains, New York 10601, pursuant to Rule 1.3(c) of the Local Rules of the United States Court for the Southern and Eastern Districts of New York, for an Order allowing the pro hac vice admission of Thomas M. Beck to appear and practice before this Court as an attorney on behalf of Verizon in this civil action. There are no pending disciplinary proceedings against Attorney Beck in any State or Federal court.



Dated: New York, New York
June 2, 2008

Respectfully submitted,

JONES DAY



Vicki R. Walcott-Edim (VW-1223)
222 East 41st Street
New York, NY 10017
(212) 326-3939

Attorneys for Defendant

TO: Michael H. Sussman, Esq.
SUSSMAN & WATKINS
40 Park Place
Goshen, New York 10924
(845) 294-3991

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDWARD ROBERT LICHWICK, JR.,

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- against -

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08 CIV 3892 (SCR)

(ECF)

**AFFIDAVIT OF VICKI R. WALCOTT-EDIM IN SUPPORT OF
MOTION FOR PRO HAC VICE ADMISSION OF THOMAS M. BECK**

VICKI R. WALCOTT-EDIM, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and an associate of Jones Day, counsel to defendant Verizon ("Verizon") in the above-captioned proceeding. I submit this affidavit in support of Verizon's application for an order granting Thomas M. Beck pro hac vice admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Verizon pursuant to Rule 1.3(c) of the Local Rules for the United States District Court for the Southern and Eastern Districts of New York.

2. Thomas M. Beck is a member of Jones Day. He was admitted to practice before the courts of the Commonwealth of Virginia on October 1, 1992 and the District of Columbia on May 14, 1993. He has been and is a member in good standing of the aforementioned bars. His Certificates of Good Standing from the Clerk of the Supreme Court of Virginia and the Clerk of the Court of Appeals for the District of Columbia are annexed hereto as Exhibits A and B, respectively. Thomas M. Beck has never been disciplined by any bar disciplinary organization

or court, and there currently are no disciplinary proceedings pending against him before any bar disciplinary organization or in any court.

3. Pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York, I request that Thomas M. Beck be permitted to participate in, argue and try the above-captioned case.

4. Because no novel issue of law is involved in this motion, I further request that this Court waive the requirement of a supporting memorandum of law pursuant to Local Civil Rule 7.1 of the United States District Court for the Southern District of New York.

5. Attached as Exhibit C is a proposed order granting this motion.

6. There has been no prior application for the relief requested herein.

WHEREFORE, it is respectfully requested that this Court grant Thomas M. Beck pro hac vice admission to the bar of this Court for the purpose of participating in, arguing and trying this case.

Dated: June 2, 2008


Vicki R. Walcott-Edm



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

*This is to certify that **THOMAS MARTIN BECK** is an active member of the Virginia State Bar in good standing.*

***MR. BECK** was licensed to practice law in Virginia on **OCTOBER 1, 1992**, after successfully passing the bar examination given by the Virginia Board of Bar Examiners.*

Issued May 27, 2008

*Karen A. Gould
Executive Director and
Chief Operating Officer*



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

THOMAS M. BECK

was on the 14TH day of MAY, 1993
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on May 23,
2008.

GARLAND PINKSTON, JR., CLERK


By: M. Charles
Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2008, the foregoing document was filed with the Clerk of the Court and served via overnight delivery in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties:

Michael H. Sussman, Esq.
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Attorney for Plaintiff


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDWARD ROBERT LICHWICK, JR.,

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[PROPOSED] ORDER
GRANTING ADMISSION TO PRACTICE PRO HAC VICE

AND NOW, having considered Defendant's request for pro hac vice admission of Thomas M. Beck pursuant to Local Rule 1.3(c), IT IS HEREBY ORDERED that said request is GRANTED. The admitted attorney, Thomas M. Beck, is permitted to appear and practice before this Court in the above-captioned case for purposes of representing Defendant Verizon.

All attorneys admitted to practice pro hac vice are required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fees.

This Order confirms the appearance of Thomas M. Beck as counsel for Defendant in this case, and it will be entered on the Court's docket. A notation of the admission pro hac vice for the above-listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

Dated: White Plains, New York
June __, 2008

Honorable Judge Stephen C. Robinson
United States District Judge